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United States of America  
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IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

CASE NO. 2:22-MJ-0095 KJN

11 Plaintiff,

STIPULATION FOR EXTENSION OF TIME FOR  
PRELIMINARY HEARING PURSUANT TO RULE  
5.1(d) AND EXCLUSION OF TIME

12 v.

13 ROBERT CHOATE,  
SARAH ANDERSON,  
FABIAN GOMEZ,  
EPIFANIO RAMIREZ,  
WENDY LABUDA,  
WILLIAM OWEN,  
JOALEEN ROGERS,  
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DATE: July 1, 2022  
TIME: 2:00 p.m.  
COURT: Hon. Deborah L. Barnes

18 Defendants.  
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Plaintiff United States of America, by and through its attorney of record, Assistant United States Attorney James R. Conolly, and defendants Sarah Anderson, Epifanio Ramirez, Wendy Labuda, and Joaleen Rogers, both individually and by and through their respective undersigned counsel of record, hereby stipulate as follows:

1. The Complaint in this case was filed on June 14, 2022. Defendants Anderson, Ramirez, Gomez, and Rogers first appeared before a judicial officer of the Court in which the charges in this case were pending on June 17, 2022, and Defendant Labuda first appeared on June 21, 2022. The court set a preliminary hearing date of July 1, 2022, and later moved the preliminary hearing for defendant Fabian Gomez only to July 8, 2022. Defendants Robert Choate and William Owen have not yet appeared in

1 this matter and are therefore not included in this stipulation.

2       2. By this stipulation, defendants Anderson, Ramirez, Labuda, and Rogers, and the  
3 government, jointly move for an extension of time of the preliminary hearing date to July 8, 2022, at  
4 2:00 p.m., before the duty Magistrate Judge, pursuant to Rule 5.1(d) of the Federal Rules of Criminal  
5 Procedure. The parties stipulate that the delay is required to allow the defense reasonable time for  
6 preparation, and for the government's continuing investigation of the case. The parties further agree that  
7 the interests of justice served by granting this continuance outweigh the best interests of the public and  
8 the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

9       3. The parties agree that good cause exists for the extension of time, and that the extension  
10 of time would not adversely affect the public interest in the prompt disposition of criminal cases.  
11 Therefore, the parties request that the time between July 1, 2022, and July 8, 2022, be excluded pursuant  
12 to 18 U.S.C. § 3161(h)(7)(B)(iv), Local Code T-4.

13           IT IS SO STIPULATED.

14           Dated: June 30, 2022

PHILLIP A. TALBERT  
United States Attorney

/s/ JAMES R. CONOLLY  
JAMES R. CONOLLY  
Assistant United States Attorney

18           Dated: June 30, 2022

/s/ DANIEL OLmos  
DANIEL OLmos  
Counsel for Defendant  
SARAH ANDERSON

20           Dated: June 30, 2022

/s/ OLAF HEDBERG  
OLAF HEDBERG  
Counsel for Defendant  
EPIFANIO RAMIREZ

23           Dated: June 30, 2022

/s/ TASHA CHALFANT  
TASHA CHALFANT  
Counsel for Defendant  
WENDY LABUDA

26           Dated: June 30, 2022

/s/ TAMARA SOLOMON  
TAMARA SOLOMON  
Counsel for Defendant  
JOALEEN ROGERS

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United States of America  
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IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

CASE NO. 2:22-MJ-0095-KJN

12 Plaintiff,

**FINDINGS AND ORDER EXTENDING TIME  
FOR PRELIMINARY HEARING PURSUANT  
TO RULE 5.1(d) AND EXCLUDING TIME**

13 v.

14 ROBERT CHOATE,  
SARAH ANDERSON,  
FABIAN GOMEZ,  
15 EPIFANIO RAMIREZ,  
WENDY LABUDA,  
WILLIAM OWEN,  
16 JOALEEN ROGERS,  
17 Defendants.  
18

DATE: July 1, 2022  
TIME: 2:00 p.m.  
COURT: Hon. Deborah L. Barnes

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20 The Court has read and considered the Stipulation for Extension of Time for Preliminary Hearing  
21 Pursuant to Rule 5.1(d) and Exclusion of Time, filed by the parties in this matter on June 30, 2022. The  
22 Court hereby finds that the Stipulation, which this Court incorporates by reference into this Order,  
23 demonstrates good cause for an extension of time for the preliminary hearing date pursuant to Rule  
24 5.1(d) of the Federal Rules of Criminal Procedure.

25 Furthermore, for the reasons set forth in the parties' stipulation, the Court finds that the interests  
26 of justice served by granting this continuance outweigh the best interests of the public and the defendant  
27 in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). The Court further finds that the extension of time would  
28 not adversely affect the public interest in the prompt disposition of criminal cases.

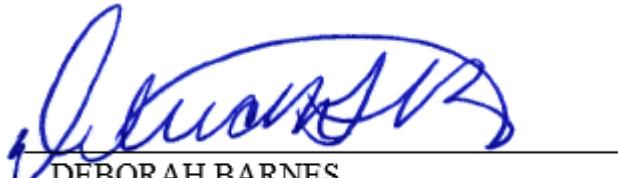
1 THEREFORE, FOR GOOD CAUSE SHOWN:

- 2 1. The date of the preliminary hearing is **EXTENDED to July 8, 2022, at 2:00 p.m.**  
3 2. The time between July 1, 2022, and July 8, 2022, shall be excluded from calculation  
4 pursuant to 18 U.S.C. § 3161(h)(7)(A).

5 3. Defendants shall appear at that date and time before the Magistrate Judge on duty.

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7 IT IS SO ORDERED.

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9 Dated: June 30, 2022

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11 DEBORAH BARNES  
12 UNITED STATES MAGISTRATE JUDGE  
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